

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Greenbelt Division)

JESSICA R. STEELE, )  
Plaintiff, )  
v. ) Case Number 8:19-cv-3314-GJH  
SAILING VESSEL "POLARIS," )  
Defendant *in rem*, )  
and )  
MARK STEELE, et al., )  
Defendants *in personam*. )

**REPLY TO PLAINTIFF'S OPPOSITION TO MOTION FOR CONTEMPT**

COMES NOW Alyssa Tantallon, LLC ("Alyssa Tantallon"), by counsel, and for its Reply to Plaintiff's Opposition to Motion for Contempt states as follows:

1. The *Polaris* was returned on April 27, 2021 – 25 days after this Court ordered that it be returned "promptly."
2. Plaintiff states that there was no good faith attempt to resolve the motion before filing it. However, the Motion for Civil Contempt was filed to compel her to take an action which the Court had already ordered her to do "promptly." Plaintiff at all times had control over the boat, and only she could arrange to have it returned. Plaintiff's Opposition provides no explanation as to why the boat had not been returned prior to the Motion for Civil Contempt, or why it took fourteen days after the motion was filed for it to be returned other than that boating professionals are "busier" now.

3. Furthermore, Plaintiff's request to require to emails and a virtual meeting before filing any additional motions seeks to impose a higher burden than that required by any of the Court rules or would be required if Plaintiff were represented by counsel.

4. Finally, her request for Rule 11 sanctions is not only not properly before the court. Nor has she presented any evidence that the Motion for Civil Contempt was "presented for improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation." As stated previously, the *Polaris*, which was ordered to be returned "promptly," was not returned until two weeks after the motion was filed, and 25 days after it was ordered to be returned. Had the motion not been filed, the boat still might not have been returned.

WHEREFORE, Alyssa Tantallon asks that this Court deny the relief requested in Plaintiff's Opposition to the Motion to Compel and grant such further relief as the Court deems appropriate.

Respectfully submitted,  
ALYSSA TANTALLON, LLC  
By counsel

By: /s/ James T. Bacon  
ALLRED, BACON, HALFHILL, & YOUNG, P.C.  
James T. Bacon, Esq. Bar No. 10956  
11350 Random Hills Road  
Suite 700  
Fairfax, VA 22030  
703-352-1300  
703-352-1301 (fax)  
[jbacon@abhylaw.com](mailto:jbacon@abhylaw.com)  
*Counsel for Alyssa Tantallon, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of April, 2021, a true copy of the foregoing was mailed first-class, postage prepaid and emailed to: Jessica Steele, 3904 Edmunds St., NW, Washington, DC 20007, letsgosailing@yahoo.com.

/s/ James T. Bacon  
James T. Bacon